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Attorney for Defendant  
**CHARLES ELLIS**

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA, ) **Case No.: 2:18-CR-00255-JAD**

Plaintiff, )

) **STIPULATION FOR RE-SENTENCING**  
) **TO ADDRESS SPECIAL USSG FACTORS**

vs. )

CHARLES ELLIS, )  
Defendant. )

**CERTIFICATION: This STIPULATION is timely filed.**

COME NOW, the United States of America by and through the Office of the United States Attorney, JASON FRIERSON, United States Attorney, by and through Assistant United States Attorney EDWARD G. VERONDA, and Defendant CHARLES ELLIS, by and through his counsel Donald J. Green, Esq., who submit this STIPULATION FOR RE-SENTENCING TO ADDRESS SPECIAL UNITED STATES SENTENCING GUIDELINES FACTORS.

This STIPULATION is submitted pursuant to FRCrP 1 and 2.

This STIPULATION is entered into for the following reasons:

1. The initial sentencing of the defendant occurred on November 8, 2023.

2. On November 9, 2023, the Court, the Government and the defense were notified by U.S. Probation of new USSG Factors which needed to be addressed and applied to the sentence.

3. Subject to the Court's approval, the parties have agreed that the best way to address a new USSG evaluation suggested by U.S. Probation is to conduct further sentencing proceedings.

3. The following proposed dates and times for sentencing are submitted for the Court's consideration:

A. DECEMBER 13, 2023: 100pm, 200pm or 300pm.

B. DECEMBER 14, 2023: 100pm, 200pm or 300pm.

***[SPECIAL REQUEST: 12/14/2023 is the preferred date as both Government Counsel will be available.]***

C. JANUARY 8, 2024: 1100am, 100pm, 200pm or 300pm

D. JANUARY 9, 2024: 100pm, 200pm or 300pm

4. Defendant consents to this STIPULATION.

5. This STIPULATION does not implicate any aspects of the Speedy Trial Act.

6. This is the FIFTH request for a continuance of the sentencing of the defendant.

DONALD J. GREEN ESQ.  
\_\_\_\_\_/s/ D. Green 11/14/2023  
**Counsel for Defendant**

**JASON M. FRIERSON**  
**UNITED STATES ATTORNEY**  
\_\_\_\_\_/s/ E VERONDA 11/14/2023  
**EDWARD G. VERONDA AUSA**


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**ORDER TO CONTINUE SENTENCING**

Based upon the STIPULATION of the parties, with the defendant consenting to said continuance, and GOOD CAUSE appearing:

**IT IS ORDERED that the re-sentencing of the defendant shall be set for January 8, 2024, at 3:00 p.m.**

**DATED THIS 16th day of NOVEMBER, 2023**

  
\_\_\_\_\_  
**Hon. JENNIFER DORSEY**  
**United States District Judge**